

ROTHMAN, SCHNEIDER, SOLOWAY & STERN, LLP

Attorneys at Law
100 Lafayette Street, Suite 501
New York, NY 10013

Franklin A. Rothman
Jeremy Schneider
Robert A. Soloway
David Stern
Rachel Perillo

Tel: (212) 571-5500
Fax: (212) 571-5507

February 3, 2021

Hon. Naomi Reice Buchwald
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Daniel Delvalle
16 Cr. 174 (NRB)

Dear Judge Buchwald:

Pursuant to Your Honor's direction I write to further explain my failure to timely submit my associate'ss hours on the above referenced matter. While it is not a reason of which I am proud, the request for associate hours was not submitted on time purely as an oversight. I had a number of capital case commitments including extensive foreign travel to both Uzbekistan and El Salvador, and voluminous discovery review since the conclusion of Mr. Delvalle's case. In the midst of all of that I simply failed to notice that billing had not been done for Ms. Perillo's hours. I had not given my completed hours to my Office Manager who prepares vouchers for all the partners in the firm and it just did not get done.

For these reasons, I did not complete the voucher for Mr. Delvalle's case within the 45 day period. However, I pray that this oversight on my part will be excused in this matter.

Application granted.

SO ORDERED.


NAOMI REICE BUCHWALD
UNITED STATES DISTRICT JUDGE

Dated: New York, New York
February 4, 2021

Hon. Naomi Reice Buchwald
February 3, 2021
Page Two

I respectfully request that this application for payment be approved by this Honorable Court.

Thank you for your attention in this matter.

Sincerely,

David Stern

David Stern

DS/sc